

# EXHIBIT K



**U.S. Department of Justice**

Criminal Division

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*Fraud Section*

April 14, 2023

**Via FedEx Delivery & Email**

Re: **United States v. Constantinescu et al, No. 4:22-CR-00612**

Dear Counsel:

Enclosed please find a hard drive containing discovery relating to the above-captioned matter. This is the 7<sup>th</sup> production of discovery. The government anticipates producing additional discovery on a rolling basis. For security purposes, the password will be provided via e-mail. An index of the materials provided is enclosed.

The hard drive contains 2 zip files, labeled "Production 7 part 1" and "Production 7 part 2", and covers the following Bates ranges:

DOJ-PROD-0000329503-DOJ-PROD-0000334900  
DOJ-TWITTER-0000000001\_reprocessed-DOJ-TWITTER-0000000001\_reprocessed  
DOJ-SW-0000000002-DOJ-SW-0000000002

Enclosed in this production is correspondence between the victim-witness coordinator and individuals who reached out to the Department of Justice and self-identified as victims after the indictment in this case. We are producing correspondence and victim-impact statements that the victim-witness coordinator received as of March 31, 2023. We will collect and produce additional victim correspondence and statements after that date on a rolling basis going forward.

Also, enclosed in this production are processed Twitter files (to include tweets and direct and group messages that hit on search terms) for Defendants Constantin, Hrvatin, Cooperman, and Knight. We recognized recently during our review that Twitter's initial search-warrant production for these defendants did not contain corresponding attachments/multimedia associated with certain Tweets and messages. We therefore requested that Twitter produce the missing multimedia files associated with the Tweets and messages and processed Twitter's subsequent production, which we received the week of March 20. The enclosed Twitter materials are largely duplicative of our prior Twitter productions but are being reproduced in whole to assist your review and trial preparation. As with our previous Twitter productions, this production is searchable. We have also enclosed with this production the unprocessed, original files.

In this production, the government may have provided, as a courtesy, material which is not discoverable under Rule 16, *Jencks*, *Giglio*, or *Brady*. The fact that certain non-discoverable

materials are provided in no way obligates the government to provide all non-discoverable materials, and the fact that certain non-discoverable materials are provided should not be taken as a representation as to the existence or non-existence of any other non-discoverable materials.

By opening this production, you agree that the produced materials are sensitive and confidential, should be used only for purposes of the above-captioned case, and shall not be publicly disclosed unless in a way authorized by the court.

If you have any questions or concerns, please contact me at (202) 355-5704 or [Scott.Armstrong@usdoj.gov](mailto:Scott.Armstrong@usdoj.gov).

Sincerely

/s/ Scott Armstrong

Scott Armstrong, Assistant Chief

John Liolos, Trial Attorney